REMARKS

Examiner has rejected claims 1 through 22 under 35 U.S.C.§ 102 (b) as being anticipated by USPN 5,657,252 (George). Applicant respectfully traverses the rejection and requests reconsideration.

Below, Applicant responds to the new arguments raised by Examiner. Then Applicant specifically points out and discusses subject matter in each of the independent claims 1 and 12 not disclosed or suggested by the cited art. On the basis of this, Applicant believes all the claims are patentable over the cited art.

Response to New Arguments Raised by Examiner

Examiner has argued the following:

> It should be noted that figure 1 of the George reference (USPN 5,657,252) shows a "control router" comprising elements 12 (router element), 14, 15, and 16. These elements are comprised within the control router.

Examiner has incorrectly called the combinations of elements 12, 14, 15 and 16 a control router. According to George, element 12 is a router. Element 14 is a backbone. Elements 15 are communication lines. Elements 16 are general purpose computers that each function as a GEM Interface server. See George at column 5, lines 31 through 44.

As can be seen in Figure 1 of George, there is a single GEM interface server 16 for each piece of factory equipment 18. Thus each Gem interface server 16 provides a separate hardware interface to only a single piece of factory equipment 18.

Examiner has argued the following:

It is well known in the art for routers to include multiple processors and/or co-processors. See for example Ammitzboell USPN 2002/0120769, Page 1 Paragraph 0008.

Ammitzboell USPN 2002/0120769, at page 1, paragraph 0008 indicates that routers can include multiple processors or co-processors. Ammitzboell does not disclose or suggest that a router includes multiple general purpose computers that each operate as GEM Interface servers. Persons of ordinary skill in the art would clearly recognize the difference between a router with multiple processors and a plurality of general purpose computers (all external to a conventional router), each functioning as a GEM Interface server. While each general purpose computer 16 shown in Figure 1 of George has one or more processors, no person of ordinary skill in the art would mistake any of these general purpose computers for a processor within a router.

Discussion of Independent Claim 1

Claim 1 sets out an interface between an automation host and a plurality of tools used to perform a processing step. The interface includes a plurality of virtual host interfaces all implemented within a single control router. Each virtual host interface from the plurality of virtual host interfaces provides a communications and process behavioral interface to one of the tools in the plurality of tools. This is not disclosed or suggested by George.

George discloses a dedicated interface server 16 being used for each item of factory equipment 18. George indicates the interface server is usually a general purpose computer. See George at column 5, lines 35 through 42. George

does not disclose or suggest a plurality of virtual host interfaces all implemented within a single control router, as set out in claim 1.

Applicant notes that it is well understood within the art that the term "virtual" indicates that software mimics the performance of hardware. Thus when claim 1 states that "a plurality of virtual host interfaces all implemented within a single control router", this indicates to a person of ordinary skill in the art (or any person with a dictionary or any understanding of how terms are used in the art) that a single control router implements in software a plurality of host interfaces. This is not disclosed or suggested by George.

George shows multiple general purpose computers 16 that each implement a GEM Interface server. Thus, George does not use virtual host interfaces, but rather utilizes dedicated hardware to implement each GEM interface.

Further, while George does disclose a router 12 in Figure 1, George uses the term "router" in the conventional fashion to refer to an industry standard router. Examiner's attempt to redefine the term "router" to include not only a conventional router but several general purpose computers 16 connected to router 12 through a backbone 14 and various communications line 15 is without precedent in the art. While Ammitzboell indicates a router can have multiple processors, this does not disclose or suggest that a router includes multiple general purpose computers that each operate as GEM Interface servers.

Words have established meanings. The term "router" is a term often used in the art. The term "router" does not mean several general purpose computers

connected through a backbone and various communications line to a "conventional router", as Examiner has argued in the rejection. The combination of router 12, backbone 14, communication lines 15 and general purpose computers 16 disclosed in Figure 1 of George does not disclose or suggest a plurality of virtual host interfaces all implemented within a single control router as set out in claim 1 of the present case.

Discussion of Independent Claim 12

Claim 12 sets out a method for connecting an automation host to a plurality of tools used to perform a processing step. In a step (a), a separate communications and process behavioral interface is provided to each tool in the plurality of tools. All the separate communications and process behavioral interfaces are provided from within a single control router. This is not disclosed or suggested by George.

George discloses a dedicated interface server 16 being used for each item of factory equipment 18. George indicates the interface server is usually a general purpose computer. See George at column 5, lines 35 through 42. George does not disclose or suggest separate communications and process behavioral interfaces being provided from within a single control router, as set out in claim 12 of the present case.

While George does disclose a router 12 in Figure 1, George uses the term "router" in the conventional fashion to refer to an industry standard router. Examiner's attempt to redefine the term "router" to include not only a router

but several general purpose computers 16 connected to a router 12 through a backbone 14 and various communications line 15 is without precedent in the art. While Ammitzboell indicates a router can have multiple processors, this does not disclose or suggest that a router includes multiple general purpose computers that each operate as GEM Interface servers.

Words have established meanings. The term "router" is a term often used in the art. The term "router" does not mean several general purpose computers connected through a backbone and various communications line to a "conventional router", as Examiner has argued in the rejection.

Conclusion

Applicant believes the present application is in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,

WILLIAM T. O'GRADY, JR.
JOEL TAYLOR;
RYO TAKEDA
NOBUHIKO YOSHIMURA
JOHN D. McNEILL
DONALD F. SHAFER
JANET GILMORE
PATRICK DOANE

By _____
Douglas L. Weller
Reg. No. 30,506

May 31, 2005
Santa Clara, California
(408) 985-0642